

**IN THE UNITED STATES BANKRUPTCY COURT
OF THE DISTRICT OF DELAWARE**

In re: _____)
DEPARTMENT 13, INC.,) Chapter 7
Debtor. _____) Case No. 23-10691 (CTG)

CERTIFICATION OF COUNSEL

I, Garvan F. McDaniel, Esquire, counsel for Genghiscomm Holdings, LLC and Mr Steve Shattil (“Movants”) with respect to the above captioned proceeding, hereby certify as follows:

1. On June 29, 2023 the Movants’ filed their Motion for Relief from the Automatic Stay at docket number 18 (the “Motion”).
2. On July 6, 2023, the Trustee filed an objection to the Motion at docket number 24 (the “Objection”)
3. In order to resolve the Motion the parties have agreed to a form of order attached hereto as **Exhibit A** (the “Proposed Order”).

WHEREFORE, the Movants respectfully requests entry of the Proposed Order approving the Motion.

Date: November 28, 2023

/s/ Garvan F. McDaniel

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